



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 20 1996

SUBJECT: Request for Funding to Conduct a CERCLA Removal Action at the AR Communications Site, Eatontown, Monmouth County, New Jersey - ACTION MEMORANDUM

FROM: Bonita L. Green, On-Scene Coordinator
Response and Prevention Branch

TO: Richard L. Caspe, Director
Emergency and Remedial Response Division

Thru: Bruce E. Sprague, Chief
Response and Prevention Branch

Site ID No.: HT

I. PURPOSE

The purpose of this Action Memorandum is to request funding in order to conduct the time-critical removal action described herein at the AR Communications Site, 91 Main Street, Eatontown, Monmouth County, New Jersey.

On February 6, 1996, the U.S. Environmental Protection Agency (EPA) received a verbal request from the New Jersey Department of Environmental Protection (NJDEP) to perform an assessment at the the AR Communications Site, in Eatontown, NJ, under the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by 42 U.S.C. §9601 et. seq.

The site contains 28 drums of unknown material and the presence of hazardous substances was in question. Two sampling episodes were conducted in order to confirm the presence of hazardous substances and support the Toxic Substances and Control Act (TSCA) enforcement action.

This Action Memorandum provides for site stabilization, sampling and disposal of all hazardous substances present on this site.

This site is not on the National Priorities List (NPL) and there are no nationally significant or precedent-setting issues associated with this site.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

The AR Communications site is located at 91 Main Street, Eatontown, Monmouth County, New Jersey. The site consists of 28 drums stored in the rear of a single story operating business. The drums were generated as a result of the site previously housing a gasoline service station. The site had an underground storage tank of waste oil. The drums were filled with the remaining waste oil from the tank and the oil water mixture when the tank was being powerwashed. The site is located in both a residential and light industrial area. The drums are unsecured with no fence around the site. The drums are also left exposed to the elements and they are beginning to show signs of deterioration. There is residential housing within a quarter mile from the site and the Fort Monmouth military facility.

A preliminary assessment of the site, performed by EPA on February 7, 1996, revealed the presence of 28 unsecured drums stored on-site, with the site being unfenced. The TSCA program had been monitoring the site due to the presence of PCBs in some of the drums above the regulated threshold. The current owner has been in litigation with the previous owner to have the drums removed, however to date, he has been unsuccessful.

The drums were sampled on February 15 and April 16, 1996, in order to confirm the presence of PCBs and/or RCRA hazardous wastes. The purpose of the sampling was to confirm that the site met the criteria for a CERCLA removal action. Samples were collected by EPA on April 16, 1996, and analyzed at the EPA Region II laboratory. These results were received on June 26, 1996, and revealed that PCBs were present above the 50ppm regulated concentration and therefore, the material in the

drums will need to be properly disposed of.

2. Physical Location

The AR Communications site is located at 91 Main Street, Eatontown, Monmouth County, New Jersey. The Site occupies 1 building on approximately 1/8 acre, is situated on the border of a large residential and light industrial area. Within 1/4 mile of the site are residential areas, light industry, commercial properties, schools and major roads.

The 1990 population census statistics within a 0.5 mile radius of the site are as follows: population is 2,743 persons comprised of 71.9% white, 20.2% black, 5.5% asian, 5.2% hispanic, and 1.7% other, with the majority, 58.4% in the age group of 20-49 years; median household income is \$17,950; 931 households comprised of 44.4% owner occupied and 55.6% renter occupied.

3. Site Characteristics

The Site is an operating business that sells and repairs communications equipment. The building is in excellent condition and made of block, with a concrete floor and a wood roof. Although, there are people working in the building during the day, the site is not secure at night. There is no fence around the site and there is easy access to the drums. The drums are stored outside in the rear of the property and are beginning to show signs of deterioration.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

A significant threat of release of hazardous substances exists at the AR Communications site. There are 28 unsecured drums stored at the site, with a stream about 20 feet away from where the drums are stored. These drums are stored outside and if they should continue to deteriorate they may begin to leak and discharge their contents into the Wompom Creek. Since the site is unsecured at night, vandals could tamper with the drums causing them to leak or roll into the creek.

Substances IdentifiedStatutory Source for Designation as
a Hazardous Substance

Polychlorinated Biphenyls	CWA ¹ §311(b)(4); RCRA §3001
Waste Ignitable liq.	RCRA ² §3001
Benzene	RCRA ² §3001

¹Clean Water Act²Resource Conservation and Recovery Act

Each of these substances may exhibit one or more of the following physical or toxicological characteristics: acutely toxic, chronically toxic, poisonous and/or flammable. PCBs are a suspected carcinogen. Benzene is a known carcinogen and a suspected tumorigen, mutagen and teratogen.

The potential health effects from these compounds are identified below:

Potential Health and Toxicological Effects

	Eye, skin, or respiratory system irritant	Toxic by inhalation, ingestion or Dermal Contact	Liver Damage	Respiratory System Damage	Central Nervous System
PCBs	X	X	X		
Benzene	X	X			X
Waste Ignit.	X	X		X	

Many of the containers on-site have no labels and, the markings are illegible or have been removed. These containers will be treated as unknown substances. Based on the site history, the contents of the drums is unrelated to the current operation and is the accumulated waste oil obtained from the excavation of the former waste oil storage tank.

5. NPL Status

At the present time, the Site is not on the NPL and there are no efforts underway to include this Site on the NPL.

B. Other Actions to Date

1. Previous Actions

The site was referred to EPA by NJDEP and a preliminary assessment was conducted by EPA. Two sampling episodes have occurred at the site and the results indicate that the site meets the criteria for a removal action.

2. Current Actions

After receiving the results of the testing, the OSC has notified the owner of EPA's intent to conduct a removal action at the property. Once funding becomes available, the site will be stabilized and the removal action will be conducted.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

The State referred the site to the EPA on February 6, 1996, and has issued notices of violation in the past with no response from the owner. To date, the local government has not conducted any actions with regards to this site.

2. Potential for Continued State/Local Response

Neither NJDEP or local government have the resources available to do the necessary removal action at the site. These organizations will act in a supporting role throughout the removal action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

Hazardous substances, pollutants or contaminants presently stored at the site present a threat to the public health and welfare as

defined by Section 300.415(b)(2) of the National Contingency Plan (NCP), in that there is a potential for releases to occur due to deterioration, tampering, vandalism or fire. The chemicals on the site are toxic, flammable and may present a significant risk of direct human contact. The site is located on the border of a residential area and is located in a light industrial area. Additionally, there is a park located across the street.

B. Threats to the Environment

Runoff from the leakage of the drums or from fire fighting efforts would go directly into the stream that is located directly adjacent to where the drums are stored. This runoff would contaminate the stream and nearby properties downstream.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the site, if not addressed by implementing the response action in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare and the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The objectives of this project are: 1) to reduce the actual or potential threat to public health and welfare; and 2) to immediately mitigate the actual or potential threat of fire, explosion, or release of hazardous substances into the environment in accordance with Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP); and 3) to remove and dispose of all hazardous substances in accordance with RCRA and EPA's CERCLA Off-Site Treatment, Storage, and Disposal Policy, Section 121(d)(3) of CERCLA, as amended.

The objectives will be achieved by performing the following tasks:

a) Site Security/Securing Drums and Containers:

The drums will be secured and sampled immediately with any leaking or deteriorated drums overpacked as necessary.

b) Transportation and Disposal:

EPA will dispose of unusable or non-recyclable hazardous materials at approved facilities in accordance with EPA's CERCLA Off-Site Disposal Policy.

2. Contribution to Remedial Performance

The proposed action will contribute effectively to any long term remedial action with respect to the release or threatened release of hazardous substances. This removal action is consistent with any potential future long-term remedial action undertaken at the site.

3. Description of Alternative Technologies

On-Site treatment is not feasible nor cost effective for the hazardous substances at this site.

4. Engineering Evaluation/Cost Analysis (EE/CA)

Due to the time-critical nature of this removal action, an EE/CA will not be prepared.

5. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs within the scope of this project, including RCRA, CERCLA and Department of Transportation regulations, that pertain to the transportation and disposal of the hazardous substances at this site, will be met to the extent practicable.

6. Project Schedule

Securing of the drums will be initiated within 24 hours upon approval of this Action Memorandum. Segregation, sampling and overpacking of all containers will be accomplished within 1 week. Disposal analysis turnaround time is estimated at 2-4 weeks and final disposal will occur shortly thereafter.

B. Estimated Costs1. Extramural Costs: Proposed Ceiling

Regional Allowance Costs: \$ 68,500

Total clean-up contractor costs
include: equipment, labor, supplies,
laboratory disposal analysis, and T&D

20% Contingency (rounded) \$ 13,700

Subtotal (rounded to nearest \$1000) \$ 82,000

Other Extramural Costs not
Funded From the Regional
Allowance:

Total Start costs, including
multiplier costs (rounded) \$ 22,000

Other Extramural Costs Contingency \$ 4,000
(20% rounded)

Subtotal Other Extramural Costs: \$ 26,000

TOTAL EXTRAMURAL COSTS: \$108,000

Intramural Costs:

Intramural Direct Costs \$ 16,000

Intramural Indirect Costs \$ 32,000

TOTAL, INTRAMURAL COSTS \$ 48,000

TOTAL REMOVAL PROJECT CEILING \$156,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action or no action could result in the release of hazardous substances into the environment, thereby exposing the nearby residents and employees of the surrounding industries to hazardous substances and causing contamination of the soil, groundwater and nearby stream system. Due to the lack of perimeter lighting, no fencing and the lack of security on the site, the potential for unrestricted access to the property, due to vandalism or children playing, could expose individuals by direct contact to the hazardous substances on-site.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

The On-Scene Coordinator will work with the Program Support Branch, the Office of Regional Counsel, the NJDEP and local authorities in an attempt to locate viable Potentially Responsible Party(s) to recover cleanup costs. The EPA TSCA program is pursuing violations for illegal storage of PCBs.

IX. RECOMMENDATION


This decision document represents the selected Removal Action for the AR Communications site, Eatontown, Monmouth County, New Jersey developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a Removal Action. It is therefore recommended that you approve this CERCLA removal funding request.

The estimated project ceiling for this site is \$156,000, of which \$82,000 is for mitigation contracting. These estimated costs for this project are within the Regional Advice of Allowance of FY-96.

Please indicate your approval for of the authorization of funding for the AR Communications site, as per the current delegation of authority by signing below.

Approved: _____


Richard L. Caspe, Director
Emergency and Remedial Response Division

Date: 9/20/96

Disapproved: _____

Richard L. Caspe, Director
Emergency and Remedial Response Division

Date: _____

cc: (after approval is obtained)

J. Fox, RA
W. Muszynski, 2DRA
K. Caspe, 2ERRD
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